

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

ENTROPIC COMMUNICATIONS, LLC,

Plaintiff,

v.

CHARTER COMMUNICATIONS, INC.;
SPECTRUM ADVANCED SERVICES,
LLC; AND SPECTRUM MANAGEMENT
HOLDING COMPANY, LLC,

Defendants.

Case No. 2:22-cv-00125-JRG

JURY TRIAL DEMANDED

UNOPPOSED MOTION FOR EXTENSION OF TIME

Pursuant to the Court's Order Granting Venue Discovery and Extension of Time to Respond to Charter's Motion to Dismiss (Dkt. 25), the current deadline for the Parties to conduct venue discovery is September 30, 2022 and the current deadline for Plaintiff to respond to Charter's Motion to Dismiss for Improper Venue (Dkt. 18) is October 14, 2022. Plaintiff respectfully requests additional time until and including October 28, 2022 for the parties to conduct venue discovery and additional time until and including November 11, 2022 to respond to Charter's Motion to Dismiss. Defendants have agreed to this revised schedule and do not oppose this motion.

The parties are engaged in ongoing discussions to resolve numerous disputes regarding the scope of venue discovery in order to avoid burdening the Court with motions practice. Charter made its first production of documents on September 20, 2022, which plaintiffs are actively reviewing. Due to the ongoing disputes and delayed document productions, the parties have not yet been able to schedule the deposition of Charter's 30(b)(6) witness and need additional time to conclude venue discovery.

A proposed order is attached herewith.

Dated: September 23, 2022

Respectfully submitted,

/s/ James Shimota by permission Wesley Hill
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CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing document was filed electronically in compliance with Local Rule CV-5(a). Therefore, this document was served on all counsel who are deemed to have consented to electronic service on this the 23rd day of September, 2022.

/s/ Wesley Hill

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies pursuant to Local Rule CV-7(h) that the relief requested in this motion is unopposed.

/s/ Wesley Hill